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FOR THE EASTE SHERMAN D C.M. COLLINS, N.J. LUN and R.C.L. MAYS, Individually and on behalf of all other similarly \$ situated, \$ \$ Plaintiffs, \$ \$ VS. \$ N \$ CATASTROPHE RESPONSE UNIT USA, \$ Defendants. \$	NDY, § § S O. 4:22-cv-1073  ONSE UNIT, § E § INC., §  OTAPED DEPOSITION OF LLINS 9, 2023	3 4 5 6 7 8 II 9 10 11 12 13 14	A P P E A R A N C E S FOR THE PLAINTIFFS: Mr. Travis Gasper GASPER LAW, PLLC 1408 North Riverfront Boulevard Suite 323 Dallas, Texas 75207 469.663.7736 833.957.2957 (fax) Travis@travisgasper.com FOR THE DEFENDANTS CATASTROPHE RESPON NC. AND CATASTROPHE RESPONSE UNIT USA, I Mr. Monte K. Hurst Ms. Kristen A. Laster HALLETT & PERRIN, P.C. 1445 Ross Avenue Suite 2400 Dallas, Texas 75202 214.953.0053 214.992.4142 (fax) Monte.Hurst@hallettperrin.com KBrumbalow@hallettperrin.com KBrumbalow@hallettperrin.com  MLSO PRESENT: Ms. Ciecili Morales Mr. David Repinski (via Zoom) Mr. Adam Dickens (via Zoom) Mr. John Hines, Videographer	
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25 <b>A. Do I make posts.</b> 25 <b>A. Yes.</b>	
7. 20 i mano pooto:	

Page 217 Page 219 1 Q. When I asked you what Facebook accounts you A. Yes. 1 2 2 Q. This is the one we're talking about. had earlier, you didn't mention Ask Shesus. Why not? 3 A. Yes. 3 A. I forgot because they're -- I forgot. Q. This was in real-time, wasn't it? 4 Q. Okay. That is an honest answer. I believe 4 5 5 A. Yes. you. Q. Super. 6 6 Tell me what the purpose of Ask Shesus 7 7 And -- and by the way, that was during is. It's a group comprised of you and other people? 8 the workday, a day in which you represented to CRU 8 A. Yes. 9 that you worked the entire day? 9 Q. Who else? A. Yes. And I did. It's at 9:09. 10 10 A. I don't know. Q. Well, you weren't working straight from 8:00 11 11 Q. You don't know who you formed a Facebook 12 to 6:00 or whatever hours you said you always worked, 12 group with? 13 right? 13 A. I formed the group and others joined. 14 14 Q. Well, how many people are in the group? A. Those are the -- I believe on this 15 15 A. I don't know. deployment, it was on whichever one is --16 16 Q. 9:00 start time? Q. It's your group, isn't it? 17 A. After, because this is during the morning 17 A. Yes, it is. 18 18 Q. You don't know anyone who's in it; you don't 19 Q. Yeah, I have no idea what you're saying right 19 know how many are in it? 20 now. Did this --20 A. I don't know how many are in it. 21 Q. Do you know anyone else in it? 21 A. So according --22 Q. Did this occur during the workday? 22 A. Other people are in it, but I don't remember 23 A. Yes, it did. 23 all of their names. 24 24 Q. Thank you. Q. Do you remember anybody's name who's in this 25 25 A. Can I elaborate on that? Facebook group you created called Ask Shesus? Page 218 Page 220 1 1 Q. No, you may not. A. No. Because it's not -- it's not even 2 2 A. Oh, cool. active. I -- it's been a while since any activity has 3 3 been in the group. Q. You continue to waste time and not answer my 4 4 Q. Okay. Five minutes la- -- let's go to the questions. 5 5 MR. HURST: Thank you. next page. 6 6 (Deposition Exhibit No. 13 was marked.) Five minutes later you post again, don't 7 7 Q. (By Mr. Hurst) I'm handing you what has been you. 8 A. Yes. 8 marked as Exhibit No. 13 to your deposition. I will 9 Q. Ask Shesus is not a Facebook group, is it? 9 represent to you, ma'am, that this is a series of 10 It's just an individual, you? 10 printouts of your Facebook activity on Monday, August 11 A. Ask Shesus is a Facebook group. 11 9, 2021, another day on which you represented to CRU 12 Q. It is? 12 that you worked the entire day. 13 A. Yes. 13 Do you recall Monday, August 9th, 2021? 14 Q. It's not an individual like your other 14 A. No. 15 Facebook accounts? 15 Q. Do you see on the first page a post you made 16 A. No. It's a group. at 9:51 a.m. that day? 16 17 Q. And so you'd be able to click on Ask Shesus 17 A. Yes. 18 and see everyone in the group? 18 Q. Who's Ask Shesus? 19 A. No. 19 A. That's a group. 20 Q. Of course not. 20 Q. It's a Facebook group? 21 A. It's a private group. 21 A. It's a group, yes. 22 Q. I'm sorry? 22 Q. Is it not your Facebook group? 23 A. It's a group on -- this is a group on 23 A. Yes. It was one I created. 24 Facebook. 24 Q. Aren't you Shesus? 25 Q. Did you just say it was a private group? 25 A. Yes.